

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES,

Plaintiff,

v.

HAMID AKHAVAN, *et uno*,

Defendants.

Case No. 20 Crim. 0188 (JSR)

DECLARATION OF MARTIN ELLIOTT

Martin Elliott hereby declares as follows:

1. During the time period 2016–19, I served as the Global Head of Franchise Risk Management at Visa Inc. The Government has served a trial subpoena for me to testify in the upcoming trial in the above-captioned case. I understand that Defendant Hamid Akhavan also has served a trial subpoena for a witness to appear on behalf of Visa, and that I am to be that witness. I make this declaration to place certain information before the Court related to my medical history and living circumstances.

2. I currently reside in Redwood City, California, and am 57 years-old. I live with my wife, who is 55 years-old. My wife and I are the primary caregivers for my mother-in-law, who is 83 years-old and lives alone in nearby Belmont, California.

3. I have been diagnosed with a number of medical conditions. These

[REDACTED]

[REDACTED]

[REDACTED]

4. My wife also has been [REDACTED]

[REDACTED] In 2020, my mother-in-law [REDACTED]
[REDACTED]

5. Neither I, my wife, nor my mother-in-law have previously contracted COVID-19. My wife and I have not been vaccinated against COVID-19 and— [REDACTED]
[REDACTED]

6. Given my health and age, as well as the health and age of my wife and mother-in-law, we have diligently heeded the CDC's public health guidance to minimize our risk of contracting COVID-19. To this end, neither I, my wife, nor my mother-in-law have traveled outside of California since COVID-19 started to take off in early 2020. Furthermore, though I did travel by airplane for a short visit to my daughter in Orange County, California, in the early summer, when the rates of new COVID-19 infections were relatively low, I have not traveled by airplane since then and certainly have no plans to travel by airplane since the significant uptick in COVID-19 cases started in the fall of 2020.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 17, 2021.

/s/ Martin Elliott

Martin Elliott